UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

March 27, 2018

Jay Peter
Haley & Aldrich
3 Bedford Farms Drive, Suite 301
Bedford, NH 03110

John Sullivan
Cabot, Cabot & Forbes
185 Dartmouth Street,
Boston, MA 02116

Re: 120 Commerce Way, Woburn, MA: EPA Risk Determination and acceptance of Haley & Aldrich March 2018 Baseline Risk Assessment/Completion Report

Dear Sirs:

EPA, in consultation with MassDEP, has reviewed your March 2018 baseline risk assessment/completion report (entitled "Draft-Final Site Investigation Completion Report, 120 Commerce Way (Associated with Industri-Plex Operable Unit 1), Woburn, Massachusetts, EPA Site Identification Number: MAD076580950" for your proposed residential development at 120 Commerce Way, Woburn, MA. This property is situated within the Industri-plex Superfund Site, Woburn, MA, at the southwestern corner of the Atlantic Avenue/ Commerce Way Intersection. EPA established soil and sediment cleanup levels for the Industri-plex Superfund Site based upon the future use of the site remaining commercial/industrial or recreational. For those properties within the Site where future residential use is being proposed, EPA is requiring property owners/entities prepare baseline risk assessments to assess potential risks for future residential, child trespasser, and construction-related exposures.

Based upon your baseline risk assessment, the following exposure pathways were determined to be incomplete, and were not evaluated in the Human Health Risk Assessment (HHRA) for the following reasons:

- Potable or non-potable uses of groundwater are associated with incomplete exposure pathways because extraction and use of groundwater for any purposes is prohibited, in accordance with the Industri-plex Operable Unit 1 Record of Decision (ROD) and the Institutional Controls required by the ROD.[1]

[1] The ROD restrictions are documented in an Industri-plex Superfund Site, Model Operable Unit 1 Notice of Activity and Use Limitation (NAUL), January 18, 2018. Individual NAULs are required to be recorded at the Registry of Deeds for each property within the Site that requires Institutional Controls.

- Direct contact with groundwater is an incomplete exposure pathway because construction excavation is not expected to extend to the groundwater table, and if it does, dewatering will be performed and workers will follow a health and safety plan required under the ROD that describes how groundwater will be managed, and worker exposures controlled, if groundwater is encountered during excavation activities.[2]

  Direct contact with soil greater than six (6) feet below ground surface (bgs) is not a complete exposure pathway because the modified ROD remedy (through an Explanation of Significant Differences (ESD))[3] will restrict excavations deeper than six (6) feet bgs and provide provisions for management of potential exposures to that soil, if excavations deeper than six (6) feet bgs are required. These provisions will require workers engaged in construction activities for soil deeper than six (6) feet bgs to follow a health and safety plan that describes how soil will be managed, and worker exposures controlled. In addition, the NAUL recorded on the property will document the restrictions required under the ESD.

- Migration of vapors from groundwater to indoor air (*i.e.*, vapor intrusion) is an incomplete exposure pathway because the building design and construction will include a vapor mitigation system, as described in the completion report, that will be installed beneath occupied ground floor building spaces.

Your baseline risk assessment evaluated the following exposure scenarios:

Soils (0 – six (6) ft bgs):

- Child Trespasser
- Residential Use (i.e., adult & child)
- Construction Worker

For the trespasser exposure scenario, the potential health risks were evaluated for older children (7 to 18 years of age) who are assumed to live at the Property in the future and would trespass onto other nearby areas of the Industri-Plex Site. The evaluation (see Appendix F of baseline risk assessment) concluded that the incremental lifetime cancer risk (ILCR) for a trespasser exposed to surface soil is within the NCP risk range of 10^{-6} to 10^{-4}, the hazard index (HI) is below 1, and the estimated blood lead levels are below consensus values used by EPA to manage lead risks.

For the residential and construction work exposure scenarios, the baseline risk assessment concluded that the ILCR was within the acceptable risk management range of 10^{-6} to 10^{-4} for residential exposures to soil from 0 to six (6) feet bgs, the ILCR was within the acceptable risk management range of 10^{-6} to 10^{-4} for construction worker exposures to soil from 0 to six (6) feet bgs, and the soil non-cancer hazard did not exceed the target organ-specific HI of 1 for either scenario (residential or construction worker exposures).

Based upon the above information, EPA agrees that the baseline risk assessment calculations for the evaluated soil exposure scenarios do not exceed EPA's risk management criteria. Therefore, EPA will propose to modify the ROD remedy to incorporate these revised baseline risk assessment calculations into the remedy through an ESD that, if adopted, will include a determination that the proposed residential use of the property is

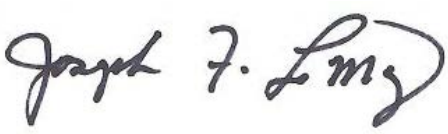
[2] These ROD requirements will be further documented in a NAUL recorded on the property.

[3] An ESD will be issued that will modify the original ROD remedy to refine the requirements for Class B Land on the property to allow residential contact with soil between 0 and 6 feet bgs and require restrictions on contact with and the management of any soil below 6 feet bgs.

reasonable. The institutional controls for the property established through the ESD shall consider the soil data presented in the baseline risk assessment and be modified to allow residential use based upon soil data collected between the ground surface (0 feet) to six (6) feet bgs on the property. The CERCLA remedy for the property will be modified to identify the entire property as Class B Land, whose soil restrictions apply at greater than six (6) feet bgs (Note: The soil sampling and baseline risk assessment demonstrate that the prior small Class C Land area [i.e., engineered cover] on the property [approximately 150 square feet] can be removed and the area reclassified as Class B Land). The revised institutional controls for the property, reflecting the requirements under the ESD, shall be recorded at the registry of deeds in the form of a NAUL.

If you have any questions regarding this letter, please contact me at (617) 918-1323.

Sincerely,



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